

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

JUSTIN PULLIAM,

*Plaintiff,*

v.

Civil Action No. 4:22-cv-4210

COUNTY OF FORT BEND, TEXAS;  
SHERIFF ERIC FAGAN, in his individual  
capacity; OFFICER ROBERT  
HARTFIELD, in his individual capacity;  
OFFICER JONATHAN GARCIA, in his  
individual capacity; OFFICER TAYLOR  
ROLLINS, in his individual capacity; and  
OFFICER RICKY RODRIGUEZ, in his  
individual capacity,

*Defendants.*

**JOINT MOTION TO STAY TRIAL DEADLINES**

The parties jointly move that the Court stay the trial deadlines in this case and convert the May 31, 2024 docket call into a status hearing. The Court set this case for a three-day bench trial in June 2024 with docket call set for May 31, 2024 at 3:30 P.M. (Dkt. No. 69). Pretrial filings are due May 23, 2024. *Id.* Plaintiff's Motion for Partial Summary Judgment (Dkt. No. 61) remains pending.

Defendants' counsel, Kevin Hedges, is experiencing a serious family emergency concerning the health of his son and is currently unable to prepare for trial. The parties therefore jointly move that the Court stay the June 2024 trial date.

The parties also respectfully ask that the Court convert the May 31st docket call to a status hearing. At such a status hearing, the parties would be prepared to discuss potential trial dates and the pending summary judgment motion, which the parties anticipate could eliminate the need for a trial or reduce trial time.

Respectfully submitted,

Dated: April 23, 2024

/s/ Christen Mason Hebert  
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*Counsel for Plaintiff*  
\*Admitted *pro hac vice*

Dated: April 23, 2024

/s/ Kevin Hedges  
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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 23, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system and served by the CM/ECF system to all counsel of record.

/s/ Christen Mason Hebert

Christen Mason Hebert, Attorney-in-Charge

*Attorney for Plaintiff*